

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

TEMPEST HORSLEY,	)	
	)	
Plaintiff(s),	)	CIVIL NO. 13-cv-321-WDS-SCW
	)	CJRA TRACK: B
vs.	)	PRESUMPTIVE TRIAL MONTH:
	)	July 2014
JESSICA TRAME,	)	JUDGE: William D. Stiehl
Defendant(s).	)	
	)	

**JOINT REPORT OF PARTIES**  
**AND PROPOSED SCHEDULING AND DISCOVERY ORDER**

Pursuant to Federal Rule of Civil Procedure 26(f) and SDIL-LR 16.2(a), an initial conference of the parties was held on August 30, 2013 with attorneys Thomas G. Maag and Joshua D. Ratz participating.

SCHEDULING AND DISCOVERY PLANS WERE DISCUSSED AND AGREED TO AS FOLLOWS:

1. Initial interrogatories and requests to produce, pursuant to Federal Rules of Civil Procedure 33 and 34 shall be served on opposing parties by October 11, 2013.
2. Plaintiff's deposition shall be taken by November 15, 2013.
3. Defendant's deposition shall be taken by January 17, 2014.
4. Motions to amend the pleadings, including the commencement of a third party action, shall be filed by October 15, 2013 (which date shall be no later than **90 days** following the Scheduling and Discovery conference).
5. Expert witnesses shall be disclosed, along with a written report prepared and signed by the witness pursuant to Federal Rule of Civil Procedure 26(a)(2), as follows:  
Plaintiff's expert(s): November 8, 2013.  
Defendant's expert(s): January 10, 2014.  
Third Party expert(s): January 10, 2014.

6. Depositions of expert witnesses must be taken by:  
Plaintiff's expert(s): December 6, 2013.  
Defendant's expert(s): February 14, 2014.  
Third Party expert(s): February 14, 2014.
7. **Discovery** shall be completed by February 14, 2014 (which date shall be no later than **115 days** before the first day of the month of the presumptive trial month). Any written interrogatories or request for production served after the date of the Scheduling and Discovery Order shall be served by a date that allows the served parties the full **30 days** as provided by the Federal Rules of Civil Procedure in which to answer or produce by the discovery cut-off date.
8. All **dispositive motions** shall be filed by March 21, 2014 (which date shall be no later than **100 days** before the first day of the month of the presumptive trial month). Dispositive motions filed after this date will not be considered by the Court.
9. The Scheduling and Discovery Conference may, at the discretion of the Magistrate Judge, be canceled if the Magistrate Judge approves of the parties' proposed Scheduling and Discovery Order as submitted.

DATED: 08/30/2013

s/Thomas G. Maag  
Attorney(s) for Plaintiff(s)

s/Joshua D. Ratz  
Attorney(s) for Defendant(s)

